

SANDLER, REIFF, YOUNG & LAMB, P.C.

January 16, 2013

Via E-Mail and U.S. Mail

Mr. Jeff S. Jordan
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

OFFICE OF
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
2013 JAN 30 PM 12:39

Re: FEC MUR 6697 – Montana Hunters and Anglers Leadership Fund

Dear Mr. Jordan:

I am writing on behalf of Montana Hunters and Anglers Leadership Fund and its treasurer, Mr. Joseph Splinter, to refute unsubstantiated and false allegations made by the Republican Party of Montana regarding a public communication that did not contain a "paid for by" disclaimer.

The Leadership Fund did not make any disbursements for the purpose of financing the public communication mailing attached as Exhibit A to the Republican Party's complaint (the "Anti-Wasteful Spending Mailing"). For this reason and others discussed below, the Federal Election Commission should: 1) find no reason to believe that the Leadership Fund violated the Federal Election Act of 1971 and 2) take no action against the Leadership Fund.

Factual Background

The Leadership Fund is an independent-expenditure-only political committee registered with the FEC. In 2012, the Leadership Fund made disbursements for the purpose of financing five independent expenditure public communication mailings during the period October 29 to November 1, 2012. Copies of the Leadership Fund's direct mail pieces are attached as Exhibit A.

Every Leadership Fund direct mail piece included the "paid for by" disclaimer and the "not authorized" statement required under 2 U.S.C. §§441d(a)(2) and (3). The disclaimer and statement also complied with the size, printed box, and color contrast requirements of 2 U.S.C. §441d(c).

The Leadership Fund properly filed independent expenditure reports for these express advocacy public communications in a timely manner as required under 2 U.S.C. §434(g).

The Leadership Fund did not make any disbursements for the purposes of financing the Anti-Wasteful Spending Mailing that is the subject of the Republican Party's complaint. A declaration by the Leadership Fund's treasurer confirming these facts is attached as Exhibit B.

Legal Argument

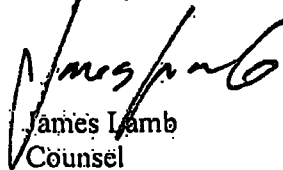
The Leadership Fund did not make disbursements for the purpose of financing the public communication mailing that is the subject of the Republican Party's complaint. The Act only requires political committees to include "paid for by" disclaimers on public communications when the "political committee makes a disbursement for the purpose of financing any" mailing. 2 U.S.C. §431d(a). Since the Leadership Fund did not make any disbursements for the Anti-Wasteful Spending Mailing it is not responsible for any disclaimers that may be required under the Act.

Conclusion

The Leadership Fund did not make any disbursements for the purpose of financing the Anti-Wasteful Spending Mailing. As a result, the Leadership Fund did not violate the Act even if a disclaimer was required to be printed on the mail piece.

Therefore, we respectfully request that the Commission find no reason to believe that the Leadership Fund violated the Act and that no further action be taken against the Leadership Fund in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "James Lamb", written over a printed name.

James Lamb
Counsel

Montana Hunters and Anglers Leadership Fund

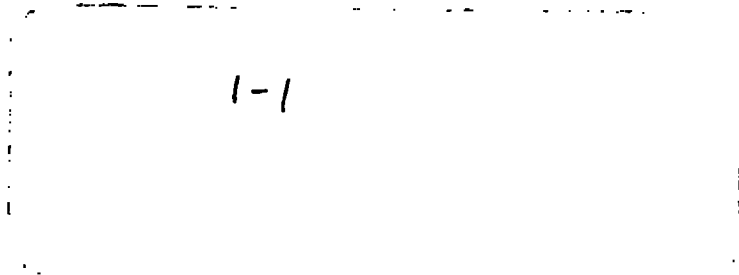
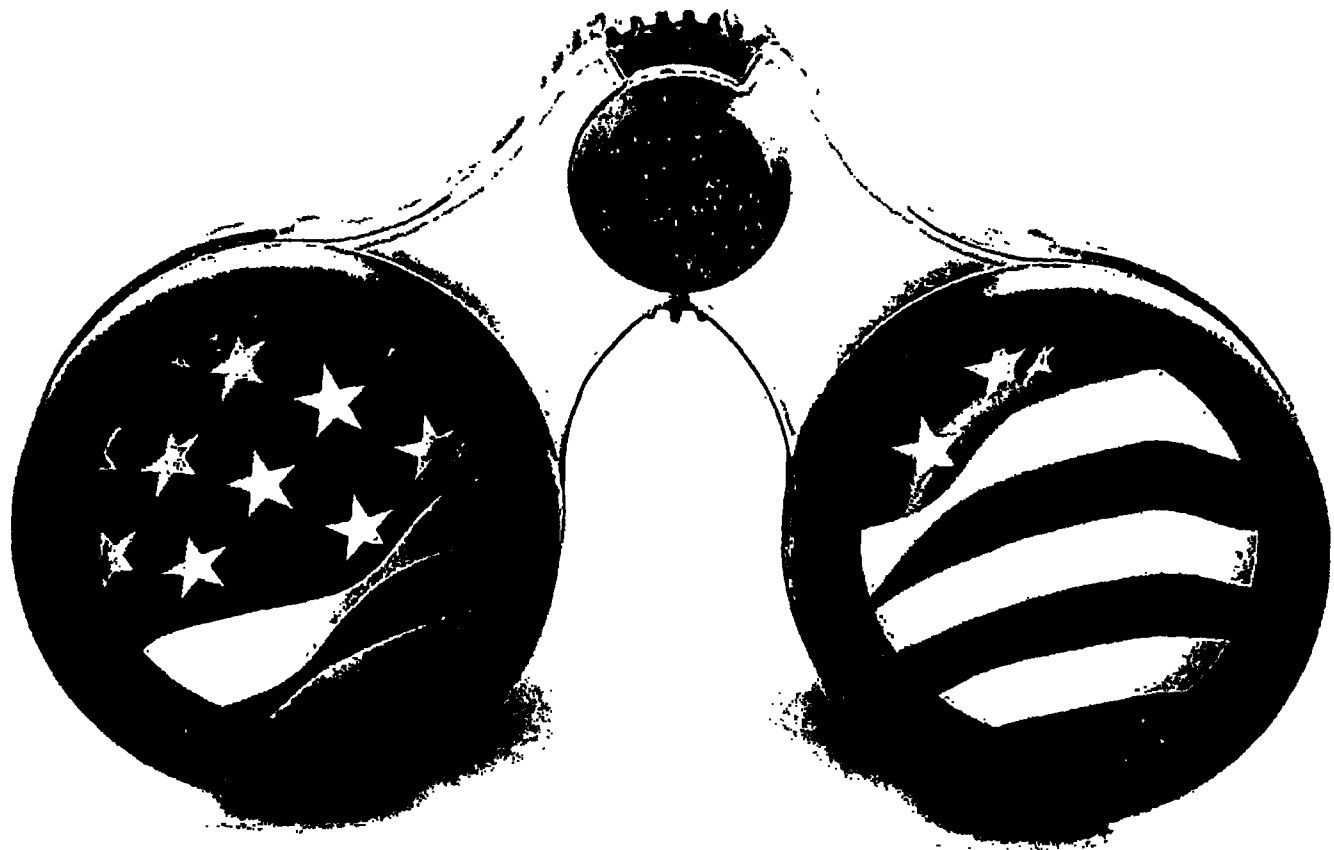
Exhibit A

Montana Hunters and Anglers Leadership Fund

FEC Response – January 16, 2013

—**பெரியசாமி கிராமம்**—

Dennis Rehberg's pledge: One nation, under surveillance



PRST STD
U.S. POSTAGE
PAID
LAS VEGAS, NV
PERMIT NO. 781

Montana Hunters and Anglers Leadership Fund
PO Box 734
Billings, MT 59103



110347MNL0000

If Rehberg gets his way, Big Government will
be watching us on our public lands.



Jon TESTER:

PROTECTING OUR OUTDOOR HERITAGE

A staunch protector of our public lands,
Jon Tester has:

- An "A" rating from the NRA and was named National Shooting Sports Foundation "Legislator of the Year"
- Been recognized by the Boone and Crockett Club for improving access for hunters
- Championed the Forest Jobs and Recreation Act



Dennis REHBERG:

PUTTING OUR PUBLIC LANDS
UNDER SURVEILLANCE

Dennis Rehberg has a record of big
government overreach. He:

- Supported the backcountry giveaway⁽¹⁾
- Voted for the Patriot Act and supported Real ID⁽²⁾
- Sponsored a bill to let the government use drones and patrols to conduct surveillance on our public lands⁽³⁾

MONTANA
HUNTERS & ANGLERS
LEADERSHIP FUND

On Tuesday November 6th,
JON TESTER
FOR US SENATE

(1) HR 1581

(2) Vote # 206, October 24, 2001 & Vote # 51, February 10, 2005

(3) HR 1505

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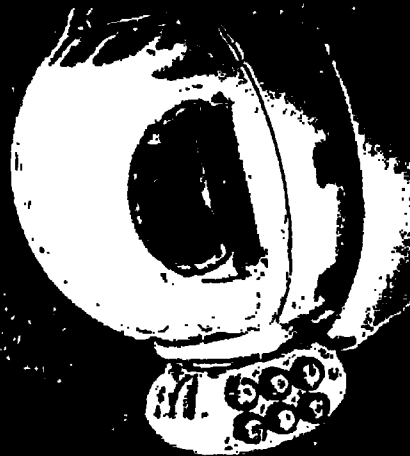
MONTANA
HUNTERS & ANGLERS
LEADERSHIP FUND

PO BOX 200
BUTTE MT 59703



2

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140491N140491N

On preserving our public lands: who can we trust?



Dennis REHBERG:

An advocate for big government overreach,
Dennis Rehberg has:

- ✗ Supported the backcountry giveaway!
- ✗ Voted for the Patriot Act and supported Real ID!
- ✗ Sponsored a bill to let the government use drones and patrols to conduct surveillance on our public lands!



Jon TESTER:

Protecting Our Outdoor Heritage

A staunch protector of our public lands,
Jon Tester has:

- An A rating from the NRA and named National Shooting Sports Foundation "Legislator of the Year"
- Opposed the backcountry giveaway.
- Served as Chairman of the Congressional Sportsmen Caucus and recognized by the Boone and Crockett Club for his work to improve hunting access.

On Tuesday November 6th, VOTE JON TESTER for US Senate

Printed on 100% recycled paper with 50% recycled content. 100% recycled paper.

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Who will protect our access to Montana's public lands?

3

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Montana Hunters and Anglers Leadership Fund
PO Box 734
Billings, MT 59103



MONTANA
HUNTERS & ANGLERS
LEADERSHIP FUND

**We need a Senator who will
stand up to big government overreach
and preserve our access to public lands.**



Dennis REHBERG:

Dennis Rehberg has sponsored legislation that gives the federal government new authority over our public lands--to conduct surveillance using drones and patrols and to build fences and forward operating bases. He also voted for the Patriot Act and Real ID.

Jon TESTER:

Committed to preserving our access to Montana's public lands, Jon Tester has worked to protect our outdoor heritage.

He earned the title "Legislator of the Year" by the National Shooting Sports Foundation and was given an "A" rating by the National Rifle Association. He is Chairman of the Congressional Sportsmen Caucus and was recognized by the Boone and Crockett Club for his work to improve hunting access.



**On Tuesday November 6th
VOTE JON TESTER for US Senate**

Paid for by Montana Hunters and Anglers Leadership Fund, PO Box 734, Billings, MT 59103 -
not authorized by any candidate or candidate's committee.

1-800-444-4001



MONTANA
HUNTERS & ANGLERS
LEADERSHIP FUND

July 1, 2000

4

Dennis Rehberg wants to hand this much of Montana over to the Department of Homeland Security

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LAS VEGAS, NV
PERMIT NO. 781



THANK YOU



- caution and was honored by the Boone and Crockett Club for his work to improve hunting access.



- On Tuesday, November 6th,
VOTE JON TESTER
FOR US SENATE

140044M140008



CONGRESSMAN DENNIS REHBERG: PUTTING OUR PUBLIC LANDS UNDER SURVEILLANCE

He supports big government
overreach when it comes to our
civil liberties. He:

- ✗ voted for the Patriot Act,⁽¹⁾
- ✗ supported Real ID,⁽²⁾
- ✗ and sponsored a bill to let the
government use drones and
patrols to conduct surveillance
on our public lands.⁽³⁾

**Say No to Rehberg-style
big government.**



(1) Vote #398, October 24, 2001
(2) Vote #31, February 10, 2005
(3) HR 1505, introduced April 12, 2011



**MONTANA
HUNTERS & ANGLERS
LEADERSHIP FUND**

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5

Montana Hunters and Anglers Leadership Fund
PO Box 254
Billings, MT 59104

Who can we count on to protect our rights?

DAN COX is a true conservative, dedicated to protecting liberty and Constitutional rights for Montanans. Freedom is his number one priority. He trusts us - not the government - to run our own lives.



Dan Cox is:

- **OPPOSED** to the Patriot Act
- **OPPOSED** to the stimulus package
- **OPPOSED** to big bank bailouts
- **OPPOSED** to all forms of unconstitutional spending
- **OPPOSED** to more federal gun control

On Tuesday, November 6th,

Vote for Dan Cox

for the U.S. Senate

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not authorized by a candidate or a candidate's committee.